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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JORDAN D. ETZIG

Plaintiff,

vs.

EXPERIAN INFORMATION
SOLUTIONS, INC.

Defendant

Case No.

JURY DEMANDED

JURISDICTION

1. The jurisdiction of this Court attains pursuant to the FCRA, 15 U.S.C. Section 1681(p), and the doctrine of supplemental jurisdiction. Venue lies in the Southern Division of the Judicial District of Nevada as Plaintiff's claims arose from acts of the Defendant perpetrated therein.

PRELIMINARY STATEMENT

2. The Plaintiff brings this action for damages based upon Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C § 1681 *et seq.* (hereinafter referred to as "FCRA"), and of state law obligations brought as supplemental claims.

3. Plaintiff is a natural person and is a "consumer" as defined by § 1681a(c) of the FCRA.

4. The Defendant Experian Information Solutions, Inc. ("Experian"), is a corporate entity licensed to do business in the State of Nevada.

7 6. Plaintiff's creditworthiness has been repeatedly compromised by the acts,
8 obduracy and general indifference of the Defendant.

11 8. Exhibit 1 depicts AMEX' (and Defendant's) inconsistent and otherwise
12 inappropriate reporting of the accounts.

15 10. On April 8, 2020 Defendant perfunctorily verified the inaccurate AMEX accounts
16 (Exhibit 2).

12. The prior action detailed Monterey Financial Services' [MFS] deliberate, routine practice of dually reporting a single collection account under separate, different account numbers.

25 14. Defendant facilitated and otherwise proved complicit in its client's, MFS',
26 reporting and resolved the lawsuit.

Page 2

1 16. During the MFS action Plaintiff determined that on August 29, 2017 MFS
2 internally “reassigned” its account then twice reporting it on Plaintiff’s credit profile in an illegal
3 effort to wrench double payment from him.

4 17. Defendant has again facilitated and otherwise proved complicit in its client’s,
5 MFS’, reporting despite explicit prior knowledge of MFS’ illegal scheme.

6 18. Defendant profits from MFS’s misreporting.

7 19. On April 30, 2020 Plaintiff disputed the same dual reporting of two (2) MFS
8 accounts on his credit profile (Exhibit 3).

9 20. Plaintiff not only explained he did not recognize the account, but also, MFS was
10 intentionally reporting \$4,000 of alleged debt as **\$8,000**.

11 21. Defendant received Exhibit 3 on May 6, 2020 (Exhibit 4).

12 22. Defendant failed to at all respond to Plaintiff’s dispute in violation of FCRA
13 §1681i.

14 23. Defendant’s July 6, 2020 report reflects the continued misreporting of MFS
15 (Exhibit 5).

16 24. On June 5, 2020 Plaintiff disputed two (2) time barred JPMCB accounts (Exhibit
17 6).

18 25. On June 26, 2020 Defendant verified the reporting (Exhibit 7).

19 26. On June 11, 2020 Plaintiff disputed a PRA collection account (Exhibit 8).

20 27. Defendant received Exhibit 8 on June 15, 2020 (Exhibit 9).

21 28. Defendant failed to at all respond to Plaintiff’s dispute in violation of FCRA
22 §1681i.

23 29. On December 7, 2020 Plaintiff disputed the reporting of his old, closed Verizon
24 account (Exhibit 10).

25 30. In Exhibit 10 Plaintiff advised Defendant of Verizon’s explicit agreement it
26 would delete its tradeline.

27 31. Notwithstanding, on January 6, 2021 Defendant “verified” the Verizon account
28 (Exhibit 11).

1 32. On December 17, 2020 and on February 25, 2021 Plaintiff again disputed the
2 JPMCB accounts (Exhibits 12 and 13).

3 33. Proof of both each account's time barred status and settlement in full were
4 provided.

5 34. Defendant continues to negatively report both accounts.

6 35. On July 28, 2020 AMEX deleted its erroneous accounts (Exhibit 14).

7 36. On September 29 and October 1, 2020 MFS deleted its illegally reported accounts
8 (Exhibit 15).

9 37. On February 23, 2021 Verizon instructed Defendant to delete its account (Exhibit
10 16).

11 38. Defendant parroted previously reported information notwithstanding
12 documentation strongly revealing the highly unreliable nature of the information. Cushman v.
13 Trans Union Corp., 115 F.3d 220, 225 (3rd Cir. 1997).

14 39. In failing to correct Plaintiff's report, Defendant continued to report *patently*
15 *inaccurate* information in violation of the FCRA. Drew v. Equifax Information Services, LLC,
16 690 F.3d 1100, 1108 (9th Cir. 2012).

17 40. In failing to appropriately revise Plaintiff's report, Defendant provided *misleading*
18 information which likewise violated the FCRA, Drew v. Equifax Information Services, LLC, 690
19 F.3d 1100, 1108 (9th Cir. 2012).

20 41. Defendant was precluded from making any report either patently wrong or
21 "missing crucial data" or otherwise misleading. Kuns v. Ocwen Loan Servicing, LLC, 611
22 Fed.Appx. 398 (U.S. Ct. of Appeals, Ninth Circuit 2015).

23 42. Defendant violated the FCRA in its failure to provide additional information
24 explicating the status of Plaintiff's account. Bush v. Roundpoint Mortg. Servicing Corp., 122
25 F.Supp.3d 1347 (M.D.Fl 2015).

1 43. Plaintiff has suffered meaningful emotional distress including, but not limited to,
2 excessive worry, frustration, sleeplessness, anger, humiliation, embarrassment, chagrin and other
3 mental anguish as a direct result of Defendant's conduct. McCollough v. Johnson, Rodenburg &
4 Lauinger, LLC, 637 F.3d 939, 957 (9th Cir. 2011).

5
6 STATEMENT OF CLAIM AS AGAINST DEFENDANT


7 44. In the entire course of its action, Defendant willfully and/or negligently violated
8 the provisions of the FCRA in the following respects:

- 9 a. By willfully and/or negligently failing, in the preparation of the consumer reports
10 concerning Plaintiff, to follow reasonable procedures to assure maximum possible
11 accuracy of the information in the reports.
- 12 b. By willfully and/or negligently failing to comport with FCRA § 1681i.
- 13

14 PRAYER FOR RELIEF

15 THEREFORE, Plaintiff prays that the court grant the following relief as against
16 Defendant:

- 17 a. actual damages;
- 18 b. punitive damages;
- 19 c. attorney's fees; and
- 20 d. costs.

21
22
23 
24 MITCHELL D. GLINER, ESQ.
25 Nevada Bar #003419
26 3017 W. Charleston Blvd. #95
27 Las Vegas, Nevada 89102
28 Attorney for Plaintiff

March 17, 2020

CERTIFIED MAIL

Experian Information Solutions, Inc.
P.O. Box 4500
Allen, TX 75013

Re: Etzig, Jordan D. / Dispute

Dear Sir,

This letter is a Dispute. I have attached an excerpt from my recent credit profile. My attorney helped me prepare this letter to ensure you have all of the information you need to appropriately address my concerns.

I provide my personal information: Jordan D. Etzig: Spouse: n/a; current address: .
; SSN ; date of birth: , 1987.

Please delete from my report the two (2) adverse AMEX accounts reflected in the attached excerpt. I've also enclosed an excerpt from my March 10, 2020 Trans Union report. You'll note AMEX is contradictorily reporting both accounts. The first listed account reflects a purported 2.2K balance. The narrative section of the tradeline indicates it was charged-off and closed during 2/15. However, the account history at the end of the tradeline indicates no known derogatory (or any) activity since 10/13. Please delete.

The second listed AMEX account reports a 4.6K balance and contains a similar narrative. However, the account history reflects no activity since 1/14 and no derogatory activity of any kind. [It also reflects 9/2019 removal]. Really. Please delete.

Thank you in advance for your anticipated courtesy.

Very truly yours,


Jordan D. Etzig

Enclosures

PO Box 9701
Allen, TX 75013



0006017 JORDAN D ETZIG
JORDAN D ETZIG



JORDAN D ETZIG

Dispute Results

Report # 0247-6377-32 for 04/08/20

Our reinvestigation of the dispute(s) and/or other request(s) you recently submitted is now complete. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the requested status at the time of our reinvestigation.

According to the Fair Credit Reporting Act, our role in the dispute process is to review the accuracy and completeness of any disputed item which may include contacting the furnisher of the information or the vendor that collected the information from a public record source, and notifying them of the dispute and disclosing all relevant information regarding your dispute. When we contact the furnisher or vendor, we ask that they verify all of the information regarding the item you disputed and report back within 30 days of the date that we received your request (75 days for Maine residents). To help resolve the dispute, we will review all relevant documents submitted with the dispute and will forward them to the furnisher if we are unable to resolve the issue.

We review and consider the furnisher's or vendor's response to determine whether to accept it, reject it, or follow up for additional information. If, after processing, we find that the disputed information is inaccurate, incomplete or cannot be verified, we then delete or modify that information, as appropriate. If we do not receive a response from the furnisher or the vendor within the required period, we update the item as you have requested or delete the information, and send you the results.

In some instances we are able to determine whether the disputed information should be changed or deleted without having to contact the furnisher or the vendor. After we complete our processing, we send you the results. If you question the results of our dispute process, you may also contact the furnisher of information directly. Please refer to your credit report for the furnisher or public records office name, address, and phone number (if available). For more details, please visit Experian.com/disputeprocess.

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We will process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record. If we were able to make changes to your credit report based on information you provided, or if you requested the addition of a statement, we have done so. Otherwise, we have contacted the company reporting the information you disputed, supplied them all relevant information and any documents you gave us with your dispute, and instructed them to review all information we provide them about your dispute; verify the accuracy of the information, provide us a response to your dispute; and update their records and systems as necessary.

How to read your results

Deleted - This item was removed from your credit report. **Remains** - The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. **Updated** (Your results will indicate which one of the following applies.) - a) The information you disputed has been updated. Please review your report for the details. b) The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details. c) The information you disputed has been verified as accurate, however, information unrelated to your dispute has been updated. Please review your report for the details. d) Information on this item has been updated. Please review your report for the details. **Processed** - This item was either updated or deleted; Please review your report for the details.

April 30, 2020

CERTIFIED MAIL

Experian Information Solutions, Inc.
P.O. Box 4500
Allen, TX 75013

Re: **Etzig, Jordan D. / Dispute**

Dear Sir,

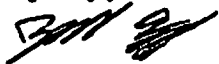
This letter is a dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my social security card and driver license. My attorney helped me prepare this letter to ensure you have all of the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Jordan D. Etzig; Spouse: n/a; current address: :
; prior address: :
; SSN : ; date of birth: ; 1987.

Please note Monterey Financial Services [MFS] and Monterey Collection Services [MCS] are *dually reporting the same alleged \$4,000 collection account*. Each tradeline also reflects precisely the same address in Oceanside, CA. I do not recognize either so please delete both. In the event either MFS or MCS can actually document this is a valid owing account, then please, at a bare minimum, surely delete one of the two accounts. It is certainly inaccurate to report the same \$4,000 account a second time suggesting I owe a total of \$8,000 when it's clear the alleged undocumented debt is \$4,000.

Thank you in advance for your anticipated courtesy.

Very truly yours,



Jordan D. Etzig

Enclosures

USPS Tracking®

FAQs >

Track Another Package +

**Track Packages
Anytime, Anywhere**

Get the free Informed Delivery® feature to receive
automated notifications on your packages

Learn More

(https://reg.usps.com/xsell?app=UspTools&ref=homepageBanner&appURL=https%3A%2F%2Finformeddelivery.usps.com/box/pages/intro/start.action)

Tracking Number: 70190700000034059272

Remove X

Your item was delivered at 2:16 pm on May 6, 2020 in ALLEN, TX 75013.

 **Delivered**

May 6, 2020 at 2:16 pm
Delivered
ALLEN, TX 75013

Get Updates ▾

Text & Email Updates



Tracking History



Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

EXHIBIT 4

Annual Credit Report - Experian

7/6/20, 11:59 AM

Prepared For

JORDAN D ETZIG

Personal & Confidential

Date Generated Jul 6, 2020

Report Number 4282-9408-22

At a Glance

16 Accounts **0** Public
Records

14 Hard
Inquiries

Personal Information

6 Names **17** Addresses **3** Employers **27** Other
Records

This information is reported to us by you, your creditors and/or other sources. Each source may report your information differently, which may result in variations of your name, address, Social Security number, etc. This is used for identification purposes only and does not factor into your Credit Score.

**Balance Histories**

Date	Balance	Scheduled Payment	Paid
Jul 2019	\$34,900	\$763	\$1,526
Jun 2019	\$36,054	\$763	\$0
May 2019	\$35,704	\$763	\$763
Apr 2019	\$36,102	\$763	\$763
Mar 2019	\$36,508	\$763	\$1,526
Feb 2019	\$37,662	\$763	\$778
Jan 2019	\$38,096	\$763	\$0
Dec 2018	\$37,699	\$763	\$763
Nov 2018	\$38,077	\$763	\$763
Oct 2018	\$38,465	\$763	\$763
Sep 2018	\$38,835	\$763	\$763
Aug 2018	\$39,216	\$763	\$0

**Contact Info**

Address PO BOX 25805,
SANTA ANA CA
92799

Phone (800) 797-6324
Number

MONTEREY COLLECTION SVCS

Potentially Negative

**Account Info**

Annual Credit Report - Experian

7/6/20, 11:59 AM

Account Name	MONTEREY COLLECTION SVCS	Balance	\$4,002
Account Number	502909XXX	Balance Updated	06/30/2020
Account Type	Collection	Recent Payment	\$0
Responsibility	Individual	Monthly Payment	\$0
Date Opened	08/29/2017	Original Balance	\$3,983
Status	Collection account. \$4,002 past due as of Jun 2020.	Highest Balance	\$0
Status Updated	06/30/2020	Terms	1 Months
		On Record Until	Feb 2024

**Payment History**

	J	F	M	A	M	J	J	A	S	O	N	D
	a	e	a	p	a	u	u	u	e	c	o	e
	n	b	r	r	y	n	l	g	p	t	v	c
2020C	C	C	C	C	C	-	-	-	-	-	-	-
2019C	C	C	C	C	C	C	C	C	C	C	C	C
2018C	C	ND	C	C	C	C	C	C	C	C	C	C

ND No data
for this
time
period

C Collection

**Balance Histories**

Annual Credit Report - Experian

7/6/20, 11:59 AM

Date	Balance	Scheduled Payment	Paid
May 2020	\$4,002	\$0	\$0
Mar 2020	\$4,002	\$0	\$0
Feb 2020	\$4,002	\$0	\$0
Jan 2020	\$4,002	\$0	\$0
Dec 2019	\$4,002	\$0	\$0
Nov 2019	\$4,002	\$0	\$0
Oct 2019	\$4,002	\$0	\$0
Sep 2019	\$4,002	\$0	\$0
Aug 2019	\$4,002	\$0	\$0
Jul 2019	\$4,002	\$0	\$0
Jun 2019	\$4,002	\$0	\$0
May 2019	\$4,002	\$0	\$0
Apr 2019	\$4,002	\$0	\$0
Mar 2019	\$4,002	\$0	\$0
Feb 2019	\$4,002	\$0	\$0
Jan 2019	\$4,002	\$0	\$0
Dec 2018	\$4,002	\$0	\$0
Nov 2018	\$4,002	\$0	\$0
Oct 2018	\$4,002	\$0	\$0
Sep 2018	\$4,002	\$0	\$0
Aug 2018	\$4,002	\$0	\$0
Jul 2018	\$4,002	\$0	\$0

**Historical Info**Original
Creditor**EMPORIUM**



Contact Info

Address **4095 AVENIDA
DE LA PLATA,
OCEANSIDE CA
92056**

Phone **(800) 456-2225**
Number



Comment

Account information disputed by consumer (Meets requirement of the Fair Credit Reporting Act).

PENNYMAC LOAN SERVICES L



Account Info

June 5, 2020

CERTIFIED MAIL

Experian Information Solutions, Inc.
P.O. Box 4500
Allen, TX 75013

Re: Etzig, Jordan D. / Dispute

Dear Sir,

This letter is a dispute. I have attached an excerpt from my recent credit profile. My attorney helped me prepare this letter to ensure you have all of the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Jordan D. Etzig; Spouse: n/a; current address:
prior address: ; SSN: ; date of birth: 1987.

Please delete the two (2) bracketed JPMCB (Chase Bank) accounts. I've provided Chase's own two (2) May 18, 2020 letters corresponding to these accounts. Please note Chase's corporate acknowledgement the accounts are indeed past the Statute of Limitations and thus time barred. Accordingly, please delete each Chase account.

Thank you in advance for your anticipated courtesy.

Very truly yours,


Jordan D. Etzig

Enclosures

PO Box 9701
Allen, TX 75013



0005155 01 M/B 0.436 **AUT0 T6 0 7154 89113-226169 -C01-P05160-1
JORDAN D ETZIG



JORDAN D ETZIG

Dispute Results

Report # 0791-9319-38 for 06/26/20

Our reinvestigation of the dispute(s) and/or other request(s) you recently submitted is now complete. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the requested status at the time of our reinvestigation.

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We will process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record. If we were able to make changes to your credit report based on information you provided, or if you requested the addition of a statement, we have done so. Otherwise, we have contacted the company reporting the information you disputed, supplied them all relevant information and any documents you gave us with your dispute, and instructed them to: review all information we provide them about your dispute; verify the accuracy of the information; provide us a response to your dispute; and update their records and systems as necessary.

How to read your results

Deleted - This item was removed from your credit report. **Remains** - The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. **Updated** (Your results will indicate which one of the following applies.) - a) The information you disputed has been updated. Please review your report for the details. b) The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details. c) The information you disputed has been verified as accurate, however, information unrelated to your dispute has been updated. Please review your report for the details. d) Information on this item has been updated. Please review your report for the details. **Processed** - This item was either updated or deleted; Please review your report for the details.

Here are your results

Credit items

JPMCB CARD 414720212023.... Outcome: Updated - Information on this item has been updated. Please review your report for the details.

JPMCB CARD 426684136190.... Outcome: Updated - Information on this item has been updated. Please review your report for the details.

Before dispute

7154-01-00 0003155-0001-0011250

JORDAN D ETZIG | Report # 0791-9319-38 for 06/26/20

JPMCB CARD Partial Acct # 414720212023 PO BOX 15369 WILMINGTON DE 19850 (800) 945 2000

Date opened Feb 2013	First reported Jul 2013	Recent balance \$8,194 as of Jun 2020	Payment history
Address ID # 020686571	Terms Not reported	Status Account charged off.	Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Type Credit Card	Monthly payment Not reported	Comment: \$8,194 written off. \$8,194 past due as of Jun 2020.	2020
Responsibility Individual	Credit limit or original amount \$7,500	Date of Status Mar 2016	2019
	High balance \$8,194		2018
			2017
			2016
			2015
			2014
			2013



After dispute

JPMCB CARD Partial Acct # 414720212023 PO BOX 15369 WILMINGTON DE 19850 (800) 945 2000

Date opened Feb 2013	First reported Jul 2013	Recent balance \$8,194 as of Jun 2020	Payment history
Address ID # 020686571	Terms Not reported	Status Account charged off.	Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Type Credit Card	Monthly payment Not reported	Comment: \$8,194 written off. \$8,194 past due as of Jun 2020.	2020
Responsibility Individual	Credit limit or original amount \$7,500	Date of Status Mar 2016	2019
	High balance \$8,194		2018
			2017
			2016
			2015
			2014
			2013

Before dispute

JPMCB CARD Partial Acct # 42684136190 PO BOX 15369 WILMINGTON DE 19850 (800) 945 2000

Date opened May 2014	First reported Jun 2014	Recent balance \$1,138 as of Jun 2020	Payment history
Address ID # 020686571	Terms Not reported	Status Account charged off.	Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Type Credit card	Monthly payment Not reported	Comment: \$1,138 written off. \$1,138 past due as of Jun 2020.	2020
Responsibility Individual	Credit limit or original amount \$800	Date of Status Apr 2016	2019
	High balance \$1,138		2018
			2017
			2016
			2015
			2014

After dispute

7154-01-CO-0003155-001-0011250

JORDAN D ETZIG | Report # 0791-9319-38 for 06/26/20

JPMCB CARD Partial Acct # 420834120190 PO BOX 15630 WILMINGTON DE 19850 (688) 415-2000											
Date opened May 2014	First reported Jun 2014	Recent balance \$1,138 as of Jun 2020	Payment history								
Address ID # 0206865571	Terms Not reported	Status Account charged off.	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Type Credit card	Monthly payment Not reported	Comment: \$1,138 written off. \$1,138 past due as of Jun 2020.	2020	20	20	20	20	20	20	20	20
Responsibility Individual	Credit limit or original amount \$800	This account is scheduled to continue on record until Jun 2022.	2019	20	20	20	20	20	20	20	20
	High balance \$1,138	Date of Status Apr 2016	2018	20	20	20	20	20	20	20	20
			2017	20	20	20	20	20	20	20	20
			2016	20	20	20	20	20	20	20	20
			2015	20	20	20	20	20	20	20	20
			2014	20	20	20	20	20	20	20	20

If our reinvestigation has not resolved your dispute, you have several options:

You may add a statement of up to 100 words to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to Experian including this information in every credit report we issue about you. You may contact the company that reports the information to us and dispute it directly with them. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly. You may provide us additional information or documents about your dispute to help us resolve it by visiting www.experian.com/upload. You may also mail your information to Experian, P.O. Box 9701, Allen, Texas 75013. You may file a complaint about Experian or the company reporting the item, with the Consumer Financial Protection Bureau or your State Attorney General's office. If there has been a change to your credit history resulting from our reinvestigation, or if you add a consumer statement, you may request that Experian send an updated report to those who received your report within the last two years for employment purposes, or within the last six months for any other purpose (the past 12 months for residents of Colorado, Maryland or New York), or within the last year for any non-employment purpose under the California Investigative Consumer Reporting Agencies Act. If you send a request to have your results sent to past recipients of your credit report, please designate the organization's name and address. In the event an organization is not specifically designated, we will generally default to sending only to companies that have requested your credit information as a result of an action you took, such as applying for credit, insurance, employment or apartment rental. If you request to have your results sent to past recipients of your investigative consumer report, you have the right to designate which entities you wish to receive the updated report and which entities you do not wish to receive the update. If interested, you may also request a description of how the reinvestigation was conducted along with the business name, address and telephone number (if reasonably available) of the furnisher of information. Thank you for helping ensure the accuracy of your credit information. For frequently asked questions about your credit report, please visit experian.com/consumerfaqs.

Your Updated Credit Report

Payment History Legend

Current	Account 150 days past due	VS	Voluntarily surrendered	D	Defaulted on contract
Account 30 days past due	180 Account 180 days past due	R	Repossession	C	Collection
Account 60 days past due	GRD Creditor received deed	PBC	Paid by creditor	CO	Charge off
Account 90 days past due	FS Foreclosure proceedings started	EC	Insurance claim	CLS	Closed
Account 120 days past due	F Foreclosed	G	Claim filed with government	ND	No data for this time period

*If your creditor reported your account balances to us, we list them in this section as additional information about your account.

Medical Information

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

JORDAN D ETZIG | Report # 0791-9319-38 for 06/26/20

Your accounts that may be considered negative The most common items in this section are late payments, accounts that have been charged off or sent to collection, and bankruptcies. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred. This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments may remain on the credit report for up to seven years. Chapters 7, 11 and 12 bankruptcies may remain on the credit report for up to 10 years. Transferred accounts that have not been past due remain up to 10 years after the date the account was transferred.

Credit items



JPMCB CARD Partial Acct # 414720212023 PO BOX 15961 WILMINGTON DE 19850 (800) 945 2000

Date opened	First reported	Recent balance	Payment history
Feb 2013	Jul 2013	\$8,194 as of Jun 2020	
Address ID #	Terms	Status	
0206866571	Not reported	Account charged off.	2020
Type	Monthly payment	\$8,194 written off. \$8,194	2019
Credit Card	Not reported	past due as of Jun 2020.	2018
Responsibility	Credit limit or original	This account is	2017
Individual	amount	scheduled to continue on	2016
	\$7,500	record until May 2022.	2015
	High balance	Comment:	2014
	\$8,194	Account closed at credit	2013
		grantor's request.	
		This item was updated	
		from our processing of	
		your dispute in Jun 2020.	
		Date of Status	
		Mar 2016	

JPMCB CARD Partial Acct # 426084136190 PO BOX 15869 WILMINGTON DE 19850 (800) 945 2000

Date opened	First reported	Recent balance	Payment history
May 2014	Jun 2014	\$1,138 as of Jun 2020	
Address ID #	Terms	Status	
0206866571	Not reported	Account charged off.	2020
Type	Monthly payment	\$1,138 written off. \$1,138	2019
Credit card	Not reported	past due as of Jun 2020.	2018
Responsibility	Credit limit or original	This account is	2017
Individual	amount	scheduled to continue on	2016
	\$800	record until Jun 2022.	2015
	High balance	Comment:	2014
	\$1,138	Account closed at credit	
		grantor's request.	
		This item was updated	
		from our processing of	
		your dispute in Jun 2020.	
		Date of Status	
		Apr 2016	

7154-01-00 0005155-0002 0011249

June 11, 2020

CERTIFIED MAIL

Experian Information Solutions, Inc.
P.O. Box 4500
Allen, TX 75013

Re: Etzig, Jordan D. / Dispute

Dear Sir,

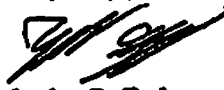
This letter is a dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my social security card and driver license. My attorney helped me prepare this letter to ensure you have all of the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Jordan D. Etzig; Spouse: n/a; current address:
prior address:
SSN: , date of birth: , 1987.

Please delete the noted Portfolio Recovery Associates (PRA) collection account. The PRA tradeline references an account attributed to Capital One. While I once indeed had a Capital One account, it is substantially older and with a much lower balance than the account referenced by PRA.

Thank you in advance for your anticipated courtesy.

Very truly yours,



Jordan D. Etzig

Enclosures

ALERT: DUE TO LIMITED TRANSPORTATION AVAILABILITY AS A RESULT OF NATIONWIDE COVID-...

USPS Tracking®

FAQs >

Track Another Package +

Track Packages Anytime, Anywhere

Get the free Informed Delivery® feature to receive automated notifications on your packages

Learn More

(https://reg.usps.com/xsell?app=UspsTools&ref=homepageBanner&appURL=https%3A%2F%2Finformeddelivery.usps.com/box/pages/intro/start.action)

Tracking Number: 70190700000034059388

Remove X

Your item was delivered at 2:20 pm on June 15, 2020 in ALLEN, TX 75013.

✓ Delivered

✗ June 15, 2020 at 2:20 pm
Delivered
ALLEN, TX 75013

Get Updates ✓

Text & Email Updates



Tracking History



Product Information



See Less ^

Can't find what you're looking for?

EXHIBIT 9

December 7, 2020

CERTIFIED MAIL

Experian Information Solutions, Inc.
P.O. Box 4500
Allen, TX 75013

Re: Etzig, Jordan D. / Dispute

Dear Sir,

This letter is a dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my social security card and driver license. My attorney helped me prepare this letter to ensure you have all of the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Jordan D. Etzig; Spouse: n/a; current address: .
Las Vegas, NV ; prior address: .
; SSN. ; date of birth: . , 1987.

Please delete the noted Verizon account. I quickly terminated my relationship with Verizon as the "service provided" was essentially non-existent. I am certainly not alone in enduring Verizon's abiding disservice. Please do note Verizon's account is fully paid. Full payment was provided simply to conclude an unsatisfactory and otherwise unhappy relationship. It was also concluded with the explicit agreement Verizon's misreporting would indeed be deleted. Again, please do delete this erroneous account.

Thank you in advance for your anticipated courtesy.

Very truly yours,



Jordan D. Etzig

Enclosures

EXHIBIT 10

How to read your results

Deleted

This item was removed from your credit report.

Remains

The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. Please review your report for the details.

Processed

This item was either updated or deleted. Please review your report for the details.

Updated (Your results will indicate which one of the following applies.)

- The information you disputed has been updated. Please review your report for the details.
- The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details.
- The information you disputed has been verified as accurate, however, information unrelated to your dispute has been updated. Please review your report for the details.
- Information on this item has been updated. Please review your report for the details.

Print your report

Below is all the information currently in your credit report. The payment history guide and common questions will help explain your credit information. Print this page or write down your report number for future access.

Address

Experian
P.O. Box 9701 Allen, TX 75013

Any pending disputes will be highlighted below.

Here are your dispute results 01/06/2021

Credit Items and Public Records

Creditor / Vendor	Account number	Status			
VERIZON WIRELESS	4727055990....	Updated	The information you disputed has been verified as accurate; however, information unrelated to your dispute has been updated. Please review your report for the details.		
Before Dispute					
Account name	Account number	Recent balance	Date opened	Status	
VERIZON WIRELESS	4727055990....	Not reported	06/2013	Paid, Closed.	
PO BOX 650051	Type	Credit limit or original amount	Date of status		
DALLAS, TX 75265	Cell Phone	Not reported	09/2015		
800 852 1922	Terms	High balance	First reported		
Address Identification number	1 Months	\$448	03/2015		
0206866571		Monthly payment	Responsibility		
		\$0	Individual		
		Recent payment amount			
		Not reported			
After Dispute					
Account name	Account number	Recent balance	Date opened	Status	
VERIZON WIRELESS	4727055990....	Not reported	06/2013	Paid, Closed.	
PO BOX 650051	Type	Credit limit or original amount	Date of status	Comment	
DALLAS, TX 75265	Cell Phone	\$448	09/2015	Account information disputed by consumer (Meets requirement of the Fair Credit Reporting Act).	
800 852 1922	Terms	High balance	First reported	Reinvestigation Information	
Address Identification number	1 Months	\$448	03/2015		
0206866571		Monthly payment	Responsibility		
			Individual		

Experian - Access your credit report

1/6/21, 2:31 PM

\$0
Recent payment amount
Not reported

This item was updated from
our processing of your dis-
pute in Jan 2021.

JPMCB CARD

414720212023....

Pending

If our reinvestigation has not resolved your dispute
view your options

Your Report

Personal Information

Name(s) associated with your credit

Name	Name identification number
JORDAN D ETZIG	14526
JORDAN ETZIG	31442
JORDAN DAN ETZIG	24631
JORDAN DANIEL ETZIG	3553
ETZIG JORDAN	9748
JORAN ETZIG	18374

Address(es) associated with your credit

Address	Address identification number	Residence type	Geographical code
5453 S DURANGO DR UNIT1069 LAS VEGAS NV 89113-2261	0880597852	Multifamily	0-296000-3-4120
7935 W OQUENDO RD LAS VEGAS NV 89113-1704	0206866571	Single family	0-296010-3-4120
8620 W RUSSELL RD APT1012 LAS VEGAS NV 89148-4503	0461614309	Apartament complex	0-582110-3-4120
5478 FAWN CHASE WAY LAS VEGAS NV 89135-4006	0853402009	Single family	0-581910-3-4120
9208 W RUSSELL RD APT206 LAS VEGAS NV 89148-1258	0753804976	Multifamily	0-582100-3-4120
PO BOX 31842 LAS VEGAS NV 89173-1842	0840563523	Post office box	0-293500-3-4120
6023 SPANISH HEIGHTS DR LAS VEGAS NV 89148-1409	0339708450	Single family	0-582110-3-4120
9705 PHOENICIAN AVE LAS VEGAS NV 89147-8337	0370166865	Single family	0-581110-3-4120
5453 S DURANGO DR LAS VEGAS NV 89113-1899	0859845032	Multifamily	0-296000-3-9040
7935 W ROAD LAS NV 89113	0555331308	Single family	0-00-0-4120
5453 S DURANGO DR UNIT10 LAS VEGAS NV 89113-1899	0883399947	Multifamily	0-296000-3-4120
9620 W RUSSELL RD LAS VEGAS NV 89148-4502	0453214171	Multifamily	0-582110-3-

December 17, 2020

CERTIFIED MAIL

Experian Information Solutions, Inc.
P.O. Box 4500
Allen, TX 75013

Re: Etzig, Jordan D. / Dispute

Dear Sir,


This letter is a dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my social security card and driver license. My attorney helped me prepare this letter to ensure you have all of the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Jordan D. Etzig; Spouse: n/a; current address: ;
; prior address: ;
; SSN ; date of birth: , 1987.

Please delete the two (2) bracketed JPMCB (Chase Bank) accounts. I have provided Chases's own two (2) September 28, 2020 letters corresponding to these accounts. Please note Chase's corporate acknowledgment the accounts are indeed past the Statute of Limitations and thus time barred. The Nevada Statute of Limitations is six (6) years and Chase has acknowledged its expiration for quite some time. I have also included copies of two (2) checks cashed by Chase in settlement of the same accounts. Please note the amounts exactly correspond to the amounts reflected in Chase's attached September 28, 2020 letters. Again, please do delete (or, at a bare minimum, appropriately update these accounts to reflect their *paid* status) these obsolete accounts.

Thank you in advance for your anticipated courtesy.

Very truly yours,



Jordan D. Etzig

Enclosures

February 25, 2021

CERTIFIED MAIL

Experian Information Solutions, Inc.
P.O. Box 4500
Allen, TX 75013

Re: Etzig, Jordan D. / Dispute

Dear Sir,

This letter is a dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my social security card and driver license. My attorney helped me prepare this letter to ensure you have all of the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Jordan D. Etzig; Spouse: n/a; current address: ;
3; prior address: ;
; SSN. ; date of birth: .

Please delete the two (2) bracketed JPMCB (Chase Bank) accounts. I have provided Chases's own two (2) September 28, 2020 letters corresponding to these accounts. Please note Chase's corporate acknowledgment the accounts are indeed past the Statute of Limitations and thus time barred. The Nevada Statute of Limitations is six (6) years and Chase has acknowledged its expiration for quite some time. I have also included copies of two (2) checks cashed by Chase in settlement of the same accounts. Please note the amounts exactly correspond to the amounts reflected in Chase's attached September 28, 2020 letters. Again, please do delete (or, at a bare minimum, appropriately update these accounts to reflect their *paid* status) these obsolete accounts.

Last, I have enclosed a copy of my filed February 2, 2021 FCRA Complaint against Chase which fully further and explicitly illustrates Chase's inaccurate reporting.

Thank you in advance for your anticipated courtesy.

Very truly yours,


Jordan D. Etzig

Enclosures

American Express
Credit Bureau Unit
PO Box 981537
El Paso, TX 79998

www.americanexpress.com

July 28, 2020

JORDAN D ETZIG



Account Identifier: 349991967994567
Social Security Number: XXX-XX-
Re: Account Ending in 61005

Dear JORDAN D ETZIG:

We are writing in response to your recent inquiry regarding the credit bureau reporting of your American Express® account referenced above.

We are pleased to advise you that we have requested the credit reporting agencies listed below to delete all information pertaining to the account identifier number from your credit report.

It may take up to thirty days for the reporting agencies to comply with our request. Please use this letter as verification until your file is updated.

Please note: The Account Identifier Number referenced above must be included in all correspondence regarding credit bureau reporting, as it is used for furnishing information to the credit reporting agencies.

If we can be of further assistance, please write us at the above listed address or call us at 1-800-874-2717. Our hours of operation are Monday through Friday from 9:00 am to 5:30 pm Eastern Time.

Sincerely,

American Express Credit Bureau Unit

Trans Union Consumer Relations 2 Baldwin Place P.O. Box 1000 Chester, PA 19022 1-800-888-4213/ 1-800-916-8800 www.transunion.com/ direct	Equifax Credit Information Services PO Box 740241 Atlanta, GA 30374 1-800-685-1111 www.equifax.com	Experian 701 Experian Parkway P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/ ra	D&B 3501 Corporate Parkway P.O. Box 520 Center Valley, PA 18034-0520 1-866-785-0429 www.dnb.com For OPEN Small Business Network accounts only
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American Express
Credit Bureau Unit
PO Box 981537
El Paso, TX 79998

www.americanexpress.com

July 28, 2020

JORDAN D ETZIG

Account Identifier: 349992086176235
Social Security Number: XXX-XX-
Re: Account Ending in 41003

Dear JORDAN D ETZIG:

We are writing in response to your recent inquiry regarding the credit bureau reporting of your American Express® account referenced above.

We are pleased to advise you that we have requested the credit reporting agencies listed below to delete all information pertaining to the account identifier number from your credit report.

It may take up to thirty days for the reporting agencies to comply with our request. Please use this letter as verification until your file is updated.

Please note: The Account Identifier Number referenced above must be included in all correspondence regarding credit bureau reporting, as it is used for furnishing information to the credit reporting agencies.

If we can be of further assistance, please write us at the above listed address or call us at 1-800-874-2717. Our hours of operation are Monday through Friday from 9:00 am to 5:30 pm Eastern Time.

Sincerely,

American Express Credit Bureau Unit

Trans Union Consumer Relations 2 Baldwin Place P.O. Box 1000 Chester, PA 19022 1-800-888-4213/ 1-800-916-8800 www.transunion.com/ direct	Equifax Credit Information Services PO Box 740241 Atlanta, GA 30374 1-800-685-1111 www.equifax.com	Experian 701 Experian Parkway P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/ ra	D&B 3501 Corporate Parkway P.O. Box 520 Center Valley, PA 18034-0520 1-866-785-0429 www.dnb.com For OPEN Small Business Network accounts only
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Universal Data Form

AUD Correction Indicator: Update ☐ Delete ☒ Delete due to fraud ☐

Subscriber Name: Monterey Financial Svcs Inc

Equifax SC: 181YC01380

Subscriber Address: 4095 Avenida De La Plata, Oceanside, CA 92056

Experian SC: 3981153

Innovis SC:

TU SC: 34VG003

Consumer Information

Last Name	First Name	Middle Name	Gen.	SSN	DOB
ETZIG	JORDAN				
Current Address		City	State	Zip+4	
Previous Last Name		Previous First Name	Previous Middle Name	Previous Gen.	
Previous Address		City	State	Zip+4	
Consumer Information Indicator:		ECOA: 1		Phone:	

Employment Information

Employer Name:	Occupation:
Current Address	City State Zip+4

Associated Consumer Information

Last Name	First Name	Middle Name	Gen.	SSN	DOB
Current Address		City	State	Zip+4	
Consumer Information Indicator:		ECOA:		Phone:	
Last Name	First Name	Middle Name	Gen.	SSN	DOB
Current Address		City	State	Zip+4	
Consumer Information Indicator:		ECOA:		Phone:	

Account Information

Account Number	Date Opened	Current Balance	Amount Past Due	Portfolio Type	Credit Limit	High Credit	Schedule Monthly	SCC	CCC	
502909021	08-29-2017	\$0	\$0	O						
Term Dur./Freq.	Date Closed	Actual Payment	Date of Last Payment	Account Status	Payment Rating	Account Type	Interest Type Indicator	Date of Account Information	FCRA 1 st Date of Delinquency	Original Charge-off Amount
/	09-29-2020			DA		48		09-29-2020		
Original Creditor Name		Creditor Classification	Mortgage Agency Identifier		Sec. Marketing Agency Id Account #		Specialized Payment Indicator			
EMPORIUM										
Purchased Portfolio or Sold Name		Portfolio Indicator	Deferred Payment Start Date		Balloon Payment Due Date		Balloon Payment Amount			
Mortgage Id #						AUD Control #	101123819			

Account History

Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2020					-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-
2013	-	-	-	-	-	-	-	-	-	-	-	-

Submitted By: ESPY MORENO

Tel#: (760) 639-3500

Date: 09-29-2020

By submitting this AUD, you certify that you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect the changes noted.

EXHIBIT 15

Universal Data Form												
AUD Correction Indicator: Update <input type="checkbox"/> Delete <input checked="" type="checkbox"/> Delete due to fraud <input type="checkbox"/>												
Subscriber Name: Monterey Financial Svcs Inc							Equifax SC: 181FP01984					
Subscriber Address: 4095 Avenida De La Plata, Oceanside, CA 92056							Experian SC: 3995853					
							Innovis SC:					
							TU SC: 45ZN001					
Consumer Information												
Last Name		First Name		Middle Name		Gen.	SSN		DOB			
ETZIG		JORDAN										
Current Address				City			State		Zip+4			
Previous Last Name		Previous First Name		Previous Middle Name		Previous Gen.						
Previous Address				City			State		Zip+4			
Consumer Information Indicator:		ECOA: 1				Phone:						
Employment Information												
Employer Name:							Occupation:					
Current Address				City			State		Zip+4			
Associated Consumer Information												
Last Name		First Name		Middle Name		Gen.	SSN		DOB			
Current Address				City			State		Zip+4			
Consumer Information Indicator:		ECOA:				Phone:						
Last Name		First Name		Middle Name		Gen.	SSN		DOB			
Current Address				City			State		Zip+4			
Consumer Information Indicator:		ECOA:				Phone:						
Account Information												
Account Number		Date Opened	Current Balance	Amount Past Due	Portfolio Type	Credit Limit	High Credit	Schedule Monthly	SCC	CCC		
302538715		01-31-2017	\$0	\$0	1							
Term Dur./Freq.	Date Closed	Actual Payment	Date of Last Payment	Account Status	Payment Rating	Account Type	Interest Type Indicator	Date of Account Information	FCRA 1* Date of Delinquency	Original Charge-off Amount		
1	08-29-2017			DA		01		08-29-2017				
Original Creditor Name			Creditor Classification	Mortgage Agency Identifier			Sec. Marketing Agency Id Account #		Specialized Payment Indicator			
EMPORIUM												
Purchased Portfolio or Sold Name			Portfolio Indicator	Deferred Payment Start Date			Balloon Payment Due Date		Balloon Payment Amount			
Mortgage Id #							AUD Control #	101159859				
Account History												
Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2020				-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-
2013	-	-	-	-	-	-	-	-	-	-	-	-

Submitted By: ESPY MORENO

Tel#: (760) 639-3500

Date: 10-01-2020

By submitting this AUD, you certify that you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect the changes noted.

Universal Data Form

AUD Correction Indicator: Update ☐ Delete ☒ Delete due to fraud ☐

Subscriber Name: Verizon Wireless

Equifax SC: 401UT01469

Subscriber Address: 500 Technology Dr, Weldon Spring, MO 63304

Experian SC: 0940579

Innovis SC: 3000367

TU SC: 1R2W002

Consumer Information

Last Name	First Name	Middle Name	Gen.	SSN	DOB
ETZIG	JORDAN	D			
Current Address		City	State	Zip+4	
Previous Last Name		Previous First Name	Previous Middle Name	Previous Gen.	
Previous Address		City	State	Zip+4	
Consumer Information Indicator:		ECOA: 1		Phone:	

Employment Information

Employer Name:	Occupation:
Current Address	City State Zip+4

Associated Consumer Information

Last Name	First Name	Middle Name	Gen.	SSN	DOB
Current Address		City	State	Zip+4	
Consumer Information Indicator:		ECOA:		Phone:	
Last Name	First Name	Middle Name	Gen.	SSN	DOB
Current Address		City	State	Zip+4	
Consumer Information Indicator:		ECOA:		Phone:	

Account Information

Account Number	Date Opened	Current Balance	Amount Past Due	Portfolio Type	Credit Limit	High Credit	Schedule Monthly	SCC	CCC	
47270559900001	06-14-2013	\$0	\$0	O		\$448			XB	
Term Dur./Freq.	Date Closed	Actual Payment	Date of Last Payment	Account Status	Payment Rating	Account Type	Interest Type Indicator	Date of Account Information	FCRA 1 st Date of Delinquency	Original Charge-off Amount
1/	01-25-2015	\$176	09-18-2015	DA		4D		09-30-2015	10-18-2014	
Original Creditor Name		Creditor Classification	Mortgage Agency Identifier		Sec. Marketing Agency Id Account #		Specialized Payment Indicator			
Purchased Portfolio or Sold Name		Portfolio Indicator	Deferred Payment Start Date		Balloon Payment Due Date		Balloon Payment Amount			
Mortgage Id #						AUD Control #	102940303			

Account History

Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2021												-
2020	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-

Submitted By: Rishawn Bunche

Tel#: (636) 793-9609

Date: 02-23-2021

By submitting this AUD, you certify that you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect the changes noted.

EXHIBIT 16